

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern District)

PROTECTION ONE ALARM MONITORING, INC. *

Plaintiff *

v. *

GLESSNER PROTECTIVE SERVICES, INC.,
et al.

Case No.: JFM02CV3653

Defendants *

* * * * *

GLESSNER PROTECTION SERVICES, INC. *

Counterplaintiff *

v. *

PROTECTION ONE ALARM MONITORING, INC. *

Counterdefendant *

* * * * *

GLESSNER'S MOTION TO COMPEL DISCOVERY RESPONSES

Glessner Protective Services, Inc. ("GPS"), defendant and counter-plaintiff, and Robert L. Glessner, Jr. and Doris B. Glessner (all of whom are hereinafter sometimes collectively called "Glessner"), by their undersigned attorneys, move this Court, pursuant to FRCP 37 and Local Rule 104.8, to pass an Order compelling or discovery responses with respect to the interrogatory answers and RFP responses which are described in the attached Memorandum. Attached hereto are Glessner's Memorandum in support of this Motion and a proposed Order.

Robert J. Carson
Fed. Bar # 01021
Robert J. Carson, P.A.
345 Green Street
Havre de Grace, Maryland 21078
(410) 939-0050

Morris Kletzkin
Fed. Bar #15171
Friedlander, Misler, Sloan, Kletzkin &
Ochsman, PLLC
1101 17th Street, N.W., Suite 700
Washington, D.C. 20036
(202) 872-0800

Attorneys for Glessner Protection Services, Inc.,
Robert L. Glessner, Jr., and Doris B. Glessner,
Defendants and Counterplaintiff

Glessner//Motion to Compel Discovery2